

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

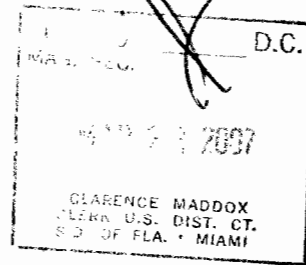
**07-20194** CR-HIGHSMITH, / McALILEY  
Case No.

21 U.S.C. § 963  
21 U.S.C. § 952(a)  
21 U.S.C. § 846  
21 U.S.C. § 841(a)(1)  
21 U.S.C. § 853

UNITED STATES OF AMERICA

vs.

JULIO RAMIREZ,  
a/k/a "Cacho,"  
VIRGINIO RUDY SUAREZ,  
a/k/a "Lulo,"  
NIEXI GARCIA-LAMELA,  
a/k/a "Niency,"  
MIGUEL SUAREZ,  
CARLOS PEREZ,  
a/k/a "Pinocho,"  
LEANDRO L. ALVAREZ-CASTILLO,  
a/k/a "Loco,"  
MARIZA A. LAMELA,  
a/k/a "Maritza,"  
ROBERTO MACEO,  
a/k/a "El Negro,"  
LAZARO GALVEZ,  
HERIBERTO SANTALLANA,  
ANA MAINES,  
LAZARO FUNDORA,  
a/k/a "Tata,"  
OSMANY SANCHEZ-LAMELA,  
a/k/a "Cooka,"  
FRANKLIN ACOSTA,  
ALEXIS MACEO,  
RODOLFO QUESADA,  
PEDRO MENDEZ,  
ORLANDO JOSE ESCOBAR,  
MARIETTA MONTESINO-SUAREZ,



**VICTOR ORLANDO PAREDES- BURBANO,**  
a/k/a "Bookley,"  
a/k/a "Don Orlando,"  
a/k/a "Don O,"  
**RAUL HUMBERTO BARAHONA,**  
a/k/a "El Viejo,"  
**GABRIEL BERNARDO CORREA-DOMINGUEZ,**  
a/k/a "Gavo O Cuco,"  
**ALBERTO SANTOS MACEO,**  
a/k/a "Tirto,"  
**JESUS ALAIN MARTIN,**  
**JOSE JAIME CALDERON-GOMEZ,**  
a/k/a "Jaime,"  
**WILLIAM GUSTAVO AGUIRRE-RENGIFO,**  
a/k/a "Willie,"  
and  
  
**JOSE MANUEL ALVAREZ-CASAS,**  
a/k/a "Chepe,"

**Defendants.**

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**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

Beginning in or about June 2002; and continuing until the date of the return of this Indictment, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,**  
a/k/a "Cacho,"  
**VIRGINIO RUDY SUAREZ,**  
a/k/a "Lulo,"  
**NIEXI GARCIA-LAMELA,**  
a/k/a "Niency,"  
**MIGUEL SUAREZ,**  
**CARLOS PEREZ,**  
a/k/a "Pinocho,"

**LEANDRO L. ALVAREZ-CASTILLO,  
a/k/a "Loco,"  
ROBERTO MACEO,  
a/k/a "El Negro,"  
LAZARO GALVEZ,  
HERIBERTO SANTALLANA,  
ANA MAINES,  
OSMANY SANCHEZ-LAMELA,  
a/k/a "Cooka,"  
FRANKLIN ACOSTA,  
ALEXIS MACEO,  
RODOLFO QUESADA,  
PEDRO MENDEZ,  
ORLANDO JOSE ESCOBAR,  
MARIETTA MONTESINO-SUAREZ,  
VICTOR ORLANDO PAREDES- BURBANO,  
a/k/a "Bookley,"  
a/k/a "Don Orlando,"  
a/k/a "Don O,"  
a/k/a "Campeon,"  
ALBERTO SANTOS MACEO  
a/k/a "Tirito,"  
RAUL HUMBERTO BARAHONA,  
a/k/a "El Viejo,"  
GABRIEL BERNARDO CORREA-DOMINGUEZ,  
a/k/a "Gavo O Cuco,"  
JOSE JAIME CALDERON-GOMEZ,  
a/k/a "Jaime,"  
WILLIAM GUSTAVO AGUIRRE-RENGIFO,  
a/k/a "Willie,"  
and  
JOSE MANUEL ALVAREZ-CASAS,  
a/k/a "Chepe,"**

did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons both known and unknown to the Grand Jury, to import into the United States from a place outside thereof a controlled substance, in violation of Title 21, United States Code, Section 952(a); all in violation of Title 21, United States Code, Section 963.

Pursuant to Title 21, United States Code, Section 960(b)(1)(B), it is further alleged that this violation involved five (5) kilograms or more of a mixture and substance containing a detectable

amount of cocaine; and

Pursuant to Title 21, United States Code, Section 960(b)(1)(A), it is further alleged that this violation involved one (1) kilogram or more of a mixture and substance containing a detectable amount of heroin.

### **COUNT 2**

On or about June 28, 2002, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**VICTOR ORLANDO PAREDES- BURBANO,**  
a/k/a "Bookley,"  
a/k/a "Don Orlando,"  
a/k/a "Don O,"  
a/k/a "Campeon,"  
and  
**RAUL HUMBERTO BARAHONA,**  
a/k/a "El Viejo,"

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(1)(B), it is further alleged that this violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine; and

Pursuant to Title 21, United States Code, Section 960(b)(1)(A), it is further alleged that this violation involved one (1) kilogram or more of a mixture and substance containing a detectable amount of heroin.

### **COUNT 3**

On or about July 15, 2004, in Miami-Dade County, in the Southern District of Florida, and

elsewhere, the defendant,

**VICTOR ORLANDO PAREDES- BURBANO,**

**a/k/a “Bookley,”**

**a/k/a “Don Orlando,”**

**a/k/a “Don O,”**

**a/k/a “Campeon,”**

did knowingly and intentionally attempt to import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a), all in violation of Title 21, United States Code, Section 963 and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(1)(B), it is further alleged that this violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine; and

Pursuant to Title 21, United States Code, Section 960(b)(1)(A), it is further alleged that this violation involved one (1) kilogram or more of a mixture and substance containing a detectable amount of heroin.

#### **COUNT 4**

On or about June 20, 2005, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**LAZARO GALVEZ,**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(1)(B), it is further alleged that this violation involved five (5) kilograms or more of a mixture and substance containing a detectable

amount of cocaine.

**COUNT 5**

On or about July 15, 2005, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ROBERTO MACEO,  
a/k/a “El Negro,”**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(1)(B), it is further alleged that this violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 6**

On or about August 12, 2005, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**JULIO RAMIREZ,  
a/k/a “Cacho,”**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(B), it is further alleged that this violation involved five (500) grams or more of a mixture and substance containing a detectable amount of cocaine.

### **COUNT 7**

On or about February 18, 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ROBERTO MACEO,**  
**a/k/a "El Negro,"**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(1)(B), it is further alleged that this violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine.

### **COUNT 8**

On or about July 15, 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**JULIO RAMIREZ,**  
**a/k/a "Cacho,"**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(A), it is further alleged that this violation involved one hundred grams or more of a mixture and substance containing a detectable amount of heroin.

**COUNT 9**

On or about September 29, 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a “Cacho,”  
CARLOS PEREZ,  
a/k/a “Pinocho,”  
and  
LEANDRO L. ALVAREZ-CASTILLO,  
a/k/a “Loco,”**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(A), it is further alleged that this violation involved one hundred grams or more of a mixture and substance containing a detectable amount of heroin.

**COUNT 10**

On or about October 3, 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**JULIO RAMIREZ,  
a/k/a “Cacho,”**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(B), it is further alleged that this violation involved five hundred grams or more of a mixture and substance containing a detectable amount of cocaine.



### **COUNT 11**

On or about October 21, 2006, in Miami-Dade County, in the Southern District of Florida,  
and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a "Cacho,"  
CARLOS PEREZ,  
a/k/a "Pinocho,"  
LEANDRO L. ALVAREZ-CASTILLO,  
a/k/a "Loco,"  
and  
ANA MAINES,**

did knowingly and intentionally import into the United States, from a place outside thereof, a  
controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18,  
United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(A), it is further alleged that this  
violation involved one hundred grams or more of a mixture and substance containing a detectable  
amount of heroin.

### **COUNT 12**

On or about October 25, 2006, in Miami-Dade County, in the Southern District of Florida,  
and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a "Cacho,"  
VIRGINIO RUDY SUAREZ,  
NIEXI GARCIA-LAMELA,  
a/k/a "Niency,"  
HERIBERTO SANTALLANA,  
ANA MAINES,  
OSMANY SANCHEZ-LAMELA,  
a/k/a "Cooka,"  
and  
WILLIAM GUSTAVO AGUIRRE-RENGIFO,  
a/k/a "Willie,"**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(B), it is further alleged that this violation involved five hundred grams or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 13**

On or about October 27, 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a "Cacho,"  
NIEXI GARCIA-LAMELA,  
a/k/a "Niency,"  
ROBERTO MACEO,  
a/k/a "El Negro,"  
HERIBERTO SANTALLANA,  
OSMANY SANCHEZ-LAMELA,  
a/k/a "Cooka,"  
FRANKLIN ACOSTA,  
ALEXIS MACEO,  
GABRIEL BERNARDO CORREA-DOMINGUEZ,  
a/k/a "Gavo O Cuco,"  
JOSE JAIME CALDERON-GOMEZ,  
a/k/a "Jaime,"  
and  
WILLIAM GUSTAVO AGUIRRE-RENGIFO,  
a/k/a "Willie,"**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(B), it is further alleged that this violation involved five hundred grams or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 14**

On or about November 2, 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a “Cacho,”  
NIEXI GARCIA-LAMELA,  
a/k/a “Niency,”  
and  
WILLIAM GUSTAVO AGUIRRE-RENGIFO,  
a/k/a “Willie,”**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(B), it is further alleged that this violation involved five hundred grams or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 15**

On or about December 15, 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a “Cacho,”  
VIRGINIO RUDY SUAREZ,  
a/k/a “Lulo,”  
NIEXI GARCIA-LAMELA,  
a/k/a “Niency,”**

**MIGUEL SUAREZ,  
and  
WILLIAM GUSTAVO AGUIRRE-RENGIFO,  
a/k/a "Willie,"**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(B), it is further alleged that this violation involved five hundred grams or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 16**

On or about December 27, 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a "Cacho,"  
VIRGINIO RUDY SUAREZ,  
a/k/a "Lulo,"  
NIEXI GARCIA-LAMELA,  
a/k/a "Niency,"  
and  
WILLIAM GUSTAVO AGUIRRE-RENGIFO,  
a/k/a "Willie,"**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(B), it is further alleged that this violation involved five hundred grams or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 17**

On or about January 14, 2007, in Miami-Dade County, in the Southern District of Florida,  
and elsewhere, the defendant,

**JULIO RAMIREZ,  
a/k/a "Cacho,"  
LEANDRO L. ALVAREZ-CASTILLO,  
a/k/a "Loco,"  
HERIBERTO SANTALLANA,  
and  
ANA MAINES,**

did knowingly and intentionally import into the United States, from a place outside thereof, a  
controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18,  
United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(A), it is further alleged that this  
violation involved one hundred grams or more of a mixture and substance containing a detectable  
amount of heroin.

**COUNT 18**

On or about February 6, 2007, in Miami-Dade County, in the Southern District of Florida,  
and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a "Cacho,"  
VIRGINIO RUDY SUAREZ,  
a/k/a "Lulo,"  
NIEXI GARCIA-LAMELA,  
a/k/a "Niency,"  
ANA MAINES,  
MARIETTA MONTESINO-SUAREZ,  
and  
WILLIAM GUSTAVO AGUIRRE-RENGIFO,  
a/k/a "Willie,"**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(B), it is further alleged that this violation involved five hundred grams or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 19**

On or about February 11, 2007, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a "Cacho,"  
VIRGINIO RUDY SUAREZ,  
a/k/a "Lulo,"  
NIEXI GARCIA-LAMELA,  
a/k/a "Niency,"  
MARIETTA MONTESINO-SUAREZ,  
and  
WILLIAM GUSTAVO AGUIRRE-RENGIFO,  
a/k/a "Willie,"**

did knowingly and intentionally import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(2)(B), it is further alleged that this violation involved five hundred grams or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 20**

Beginning in or about June 2002, and continuing until the date of the return of this

Indictment, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,**  
**a/k/a “Cacho,”**  
**VIRGINIO RUDY SUAREZ,**  
**a/k/a “Lulo,”**  
**NIEXI GARCIA-LAMELA,**  
**a/k/a “Niency,”**  
**MIGUEL SUAREZ,**  
**CARLOS PEREZ,**  
**a/k/a “Pinocho,”**  
**LEANDRO L. ALVAREZ-CASTILLO,**  
**a/k/a “Loco,”**  
**MARIZA A. LAMELA,**  
**a/k/a “Maritza,”**  
**ROBERTO MACEO,**  
**a/k/a “El Negro,”**  
**LAZARO GALVEZ,**  
**HERIBERTO SANTALLANA,**  
**ANA MAINES,**  
**LAZARO FUNDORA,**  
**a/k/a “Tata,”**  
**OSMANY SANCHEZ-LAMELA,**  
**a/k/a “Cooka,”**  
**ALEXIS MACEO,**  
**RODOLFO QUESADA,**  
**PEDRO MENDEZ,**  
**ORLANDO JOSE ESCOBAR,**  
**MARIETTA MONTESINO-SUAREZ,**  
**ALBERTO SANTOS MACEO,**  
**a/k/a “Tirto,”**  
**JESUS ALAIN MARTIN,**  
**and**  
**WILLIAM GUSTAVO AGUIRRE-RENGIFO,**  
**a/k/a “Willie,”**

did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons both known and unknown to the Grand Jury to possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(A)(ii), it is further alleged that this violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine; and

Pursuant to Title 21, United States Code, Section 841(b)(1)(A)(i), it is further alleged that this violation involved one (1) kilogram or more of a mixture and substance containing a detectable amount of heroin.

**COUNT 21**

On or about September 29, 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a "Cacho,"  
CARLOS PEREZ,  
a/k/a "Pinocho,"  
and  
LEANDRO L. ALVAREZ-CASTILLO,  
a/k/a "Loco,"**

did knowingly and intentionally possess with the intent to distribute, a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(i), it is further alleged that this violation involved one hundred grams or more of a mixture and substance containing a detectable amount of heroin.

**COUNT 22**

On or about December 15, 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,



**JULIO RAMIREZ,  
a/k/a "Cacho,"  
VIRGINIO RUDY SUAREZ,  
a/k/a "Lulo,"  
MIGUEL SUAREZ,  
and  
LAZARO FUNDORA,  
a/k/a "Tata,"**

did knowingly and intentionally possess with the intent to distribute, a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(ii), it is further alleged that this violation involved five hundred grams or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 23**

On or about January 14, 2007, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a "Cacho,"  
LEANDRO L. ALVAREZ-CASTILLO,  
a/k/a "Loco,"  
HERIBERTO SANTALLANA,  
and  
ANA MAINES,**

did knowingly and intentionally possess with the intent to distribute, a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(i), it is further alleged that

this violation involved one hundred grams or more of a mixture and substance containing a detectable amount of heroin.

**COUNT 24**

On or about February 6, 2007, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a "Cacho,"  
VIRGINIO RUDY SUAREZ,  
a/k/a "Lulo,"  
and  
ANA MAINES,**

did knowingly and intentionally possess with the intent to distribute, a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(ii), it is further alleged that this violation involved five hundred grams or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 25**

On or about February 11, 2007, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a "Cacho,"  
VIRGINIO RUDY SUAREZ,  
a/k/a "Lulo," and  
MARIETTA MONTESINO-SUAREZ,**

did knowingly and intentionally possess with the intent to distribute, a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(ii), it is further alleged that this violation involved five hundred grams or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 26**

Beginning on or about January 28, 2007 and continuing through on or about January 29, 2007, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JULIO RAMIREZ,  
a/k/a "Cacho,"  
VIRGINIO RUDY SUAREZ,  
a/k/a "Lulo,"  
MARIETTA MONTESINO-SUAREZ,  
JESUS ALAIN MARTIN,  
and  
MIGUEL SUAREZ**

did knowingly and intentionally possess with the intent to distribute, a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(ii), it is further alleged that this violation involved five hundred grams or more of a mixture and substance containing a detectable amount of cocaine.

**FORFEITURE ALLEGATIONS**

1. The allegations of Counts 1 through 26 of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America of property in which the defendants have an interest.

2. Upon conviction of any violation of Title 21, United States Code, Sections 841, 846,

952 or 963, the defendants shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as the result of such violations, and any property which the defendants used or intended to be used in any manner or part to commit or to facilitate the commission of such violations, pursuant to Title 21, United States Code, Section 853(a)(1) and (2).

All pursuant to Title 21, United States Code, Section 853(a)(1) and (2) and, the procedures outlined in Title 21, United States Code, Section 853.

A TRUE BILL

FOREPERSON

  
R. ALEXANDER ACOSTA  
UNITED STATES ATTORNEY

  
ANDREA G. HOFFMAN  
ASSISTANT UNITED STATES ATTORNEY